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9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 LATIA ALEXANDER, individually as heir of
ISAIAH T. WILLIAMS and in her capacity
12 as Special Administrator of the Estate of
ISAIAH T. WILLIAMS,

13 Plaintiff,

14 v.

15 LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of
16 the State of Nevada; KERRY KUBLA, in his
individual capacity; BRICE CLEMENTS, in
17 his individual capacity; ALEX GONZALES,
in his individual capacity; RUSSELL
18 BACKMAN, in his individual capacity;
JAMES ROTHENBURG, in his individual
19 capacity; JAMES BERTUCCINI, in his
individual capacity; MELANIE O'DANIEL,
20 in her individual capacity; DOES I-XX,
inclusive,

21 Defendants.

CASE NO. 2:24-cv-00074-APG-NJK

**SUPPLEMENT PURSUANT TO ORDER
[ECF NO. 42] RE: PLAINTIFF'S
MOTION TO FILE UNDER SEAL [ECF
NO. 37] ON PLAINTIFF'S MOTION TO
MODIFY STIPULATED PROTECTIVE
ORDER BETWEEN THE PARTIES [ECF
NO. 38]**

22 Plaintiff, LATIA ALEXANDER, individually as heir of ISAIAH T. WILLIAMS and in
23 her capacity as Special Administrator of the Estate of ISAIAH T. WILLIAMS, by and
24 through her counsels of record Adam J. Breeden, Esq. of BREEDEN & ASSOCIATES,
25

PLLC, and Corrine P. Murphy, Esq. of MURPHY'S LAW, hereby submits her SUPPLEMENT PURSUANT TO ORDER [ECF NO. 42] RE: PLAINTIFF'S MOTION TO FILE UNDER SEAL [ECF NO. 37] ON PLAINTIFF'S MOTION TO MODIFY STIPULATED PROTECTIVE ORDER BETWEEN THE PARTIES [ECF NO. 38].

Pursuant to this Court's March 21, 2025 Order [ECF No. 42], below is a list of documents Plaintiff attached to her Plaintiff's Modify Stipulated Protective Order Between the Parties [ECF NO. 38], upon which Plaintiff filed a Motion to Seal [ECF No. 37], listing which documents are, and are not covered by the current protective order:

#	DESCRIPTION	CONFIDENTIAL / SUBJECT TO PROTECTIVE ORDER
1.	Critical Incident Review Team Administrative Report ("CIRT Report")	YES
2.	Force Investigation Team Report ("FIT Report")	NO – published publicly
3.	Office of Internal Oversight Review: Key Findings, Conclusions and/or Recommendations of an Officer-Involved Shooting: Fatal	NO – published publicly
4.	Las Vegas Metropolitan Police Department Press Release	NO – published publicly
5.	Tactical Review Board LVMPD Interoffice Memorandum ("TRB Memo")	YES
6.	Initial Report of Defense Expert, Spencer Fomby	YES – contains passages to CIRT Report

For the three (3) documents currently subject to the March 12, 2024 Stipulated Protective Order [ECF No. 21] ("Protective Order"), should this Court order the documents unsealed, there are portions in the documents which ought to be redacted prior to unsealing.

...

Defendant LAS VEGAS METROPOLITAN POLICE DEPARTMENT (“LVMPD”) is in the superior position to advise which specific passages ought to be redacted. Still, Plaintiff offers the below that ought not to be publicly available. Further, for passages regarding an underlying murder investigation, Plaintiff reasonably believes the investigation is complete. To the extent the underlying murder investigation is not complete, Plaintiff suggests certain passages ought to be redacted, as outlined below.

1. CIRT Report

BATES	REDACTED PASSAGE
LVMPD 004267	Personal information regarding officer involved and Firearm serial #
LVMPD 004268	Personal information regarding officer involved and Firearm serial #
LVMPD 004269	Personal information regarding officer involved and Firearm serial #
LVMPD 004270	Personal information regarding officer involved and Firearm serial #
LVMPD 004271	Personal information regarding officer involved and Firearm serial #
LVMPD 004272-74	Personal information of additional employees involved
LVMPD 0004275	Deceased’s personal information and firearm serial #
LVMPD 004476	Murder suspects’ personal information
LVMPD 004281	Murder investigation facts
LVMPD 004284-88	Murder investigation facts
LVMPD 004293	Suspect DOB
LVMPD 004299-302	Information regarding murder investigation informant
LVMPD 004417	Firearm serial #
LVMPD 004418	Firearm serial #
LVMPD 004419	Firearm serial #
LVMPD 004420	Firearm serial #
LVMPD 004421	Firearm serial #
LVMPD 004422	Firearm serial #

...

5. TRB Memo

The TRB Memo addresses the underlying murder investigation throughout the document. LVMPD may want to redact information about the underlying murder investigation, if that investigation is active. Other than that, Plaintiff does not reasonably believe there are any portions that ought to be redacted.

6. Spencer Fromby Defense Expert Report

The Spencer Fromby Expert Report addresses the underlying murder investigation, and further cites the CIRT Report. Pursuant to § II, Scope, of the Protective Order [ECF No. 21], “[t]he protection conferred by this Protective Order covers not only Protected Material, but also any information copied or extracted therefrom...”¹ LVMPD may want to redact information about the underlying murder investigation, if that investigation is still active. Other than that, Plaintiff does not reasonably believe there are any portions that ought to be redacted, aside from the references to the CIRT Report which are currently subject to the Protective Order [ECF No. 21].

DATED: March 24, 2025.

MURPHY’S LAW

/s/ Corrine P. Murphy
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 and
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¹ See pg. 3:18-20.

CERTIFICATE OF SERVICE

I hereby certify that on **March 24, 2025**, a true and correct copy of the foregoing
SUPPLEMENT PURSUANT TO ORDER [ECF NO. 42] RE: PLAINTIFF'S
MOTION TO FILE UNDER SEAL [ECF NO. 37] ON PLAINTIFF'S MOTION TO
MODIFY STIPULATED PROTECTIVE ORDER BETWEEN THE PARTIES [ECF NO.
38] was via the method indicated below:

X	Through the Court's ECF/CM system on all registered users
	Pursuant to FRCP 5, by placing a copy in the US mail, postage pre-paid to the following counsel of record or parties in proper person: Craig R. Anderson, Esq. MARQUIS AURBACH 10001 Park Run Drive Las Vegas, NV 89145 <i>Attorney for Defendants</i>
	Via receipt of copy (proof of service to follow)

An Attorney or Employee of the following firm:

/s/ Kirsten Brown

BREEDEN & ASSOCIATES, PLLC